

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HYPERQUEST, INC.,

Plaintiff,

v.

NUGEN I.T., INC., and DAYLE PHILLIPS,

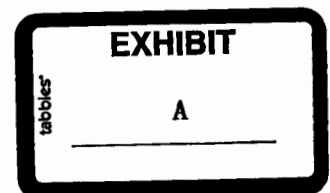
Defendants.

Case No. 1:08-cv-00485

**SUPPLEMENTAL DECLARATION OF
JOHN "PETE" TAGLIAPIETRA**

I, John "Pete" Tagliapietra, declare and state that following is true and correct:

1. My name is John "Pete" Tagliapietra. I am competent to testify about the facts set forth herein, and do so from personal knowledge.
2. I am a majority shareholder of NuGen I.T., Inc. ("NuGen") and am familiar with its day-to-day operations.
3. I read Jeffery Hogan's Declaration filed with HyperQuest's Opposition to the pending Motion to Dismiss, and perceived several factual inaccuracies.
4. It seems that Mr. Hogan is describing his own business, but the description is not that of NuGen's.
5. NuGen's customers are insurance companies, none of which are headquartered in Illinois.
6. NuGen operates and maintains password-protected websites, which are accessible only to our customers: www.vehicleassignments.com and www.viewclaims.com.



7. The insurance companies who are our customers may utilize independent appraisal companies to make inspections and write estimates; these appraisal companies are referred to as "vendors."

8. The customer insurance company sends electronic assignments using the NuGen secure website to transmit assignments to the vendor's appraisal company central office. None of these central offices are in the state of Illinois.

9. The vendor appraisal companies use independent contractors (appraisers) to write estimates. The appraisal companies send assignments to these appraisers and receives the completed information back using their own internal software to transmit this information, *not* NuGen software.

10. After the appraiser sends the estimate and other information back to the appraisal company via their own internal software, the information is then attached to our software, which carries it back to the insurance company.

11. NuGen has no contact with the vendor appraisal companies' contracted appraisers, and individual contracted appraisers do not have access to our websites, nor do they interact with NuGen personnel.

12. If there are Illinois residents accessing our websites, they are doing so without the knowledge and consent of NuGen.

13. I know that there are many companies providing similar services, although with different software programs, to the automotive insurance industry, and that it is a competitive field.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 14, 2008.


John "Pete" Tagliapietra